## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Cause No. 4:11-cv-1920 AGF
	)	
NINE THOUSAND, SIX HUNDRED	)	
(\$9.600) U.S. CURRENCY		

## ANSWER TO VERIFIED COMPLAINT OF FORFEITURE

COMES NOW the Claimant, Larry Bell, by and through counsel, and submits the following Answer to the Verified Complaint of Forfeiture:

- 1. Claimant admits the allegation in paragraph 1.
- 2. Claimant admits the allegation in paragraph 2.
- 3. Claimant denies the allegations in paragraph 3.
- 4. Claimant admits the allegation in paragraph 4.
- 5. Claimant admits the allegation in paragraph 5.
- 6. Claimant denies the allegation in paragraph 6.
- 7. Claimant does not possess sufficient information to admit or deny, and therefore, Claimant denies the allegations in paragraph 9. However, Claimant admits he \$9,6000 in United Stated currency.
- 8. Claimant does not possess sufficient information to admit or deny, and therefore, Claimant denies the allegations in paragraph 8.
  - 9. Claimant does not possess sufficient information to admit or deny, and therefore,

Claimant denies the allegations in paragraph 9.

- 10. Claimant admits the allegations in paragraph 10.
- 11. Claimant denies the allegation in 11.

WHEREFORE, Claimant prays that the property seized should be returned to him, that such seizure was unlawful, that Claimant is entitled to its return, as well as costs and reasonable attorney fees, and for such other and further relief that the court deems just and proper.

## **DECLARATION**

I, Adam Fein, am an attorney at law and a member of the law firm Rosenblum, Schwartz, Rogers and Glass, P.C., attorneys for the Claimant, Larry Bell, in this action. I declare under penalty of perjury that the foregoing Answer to Verified Forfeiture Complaint is based upon information furnished to me and that the contents therein are true and correct to the best of my knowledge and belief. Executed this 11th day of January, 2012.

/s/ N. Scott Rosenblum

Attorney for Claimant, Larry Bell N. Scott Rosenblum, #33390 MO 120 South Central Avenue, Suite 130 Clayton, Missouri 63105 (314) 862-4332

## **CERTIFICATE OF SERVICE**

By signature above, I further certify that on January 11, 2012, the foregoing was served by operation of the Court's electronic filing system on Mr. Zia Faruqui, assistant United States attorney.